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STATE - INDIANA

INDIANA UTILITY REGULATORY COMMISSION

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Telecommunications Access Policy Division Wireline Competition Bureau Federal Communications Commission The Portals II 44512<sup>th</sup> Street, SW, Suite 5-A420 Washington, DC 20554

Re Allocation of Three-Digit Telephone Number To Access One Call Services Nationwide FCC Docket Number 92-237 September 19, 2003

Dear Mr Chairman.

We are writing to you to express our full support of the U.S. Department of Transportation August 28, 2003 Petition for Rulemaking (Docket Number 92-105) in the matter of the allocation of a nationwide three-digit telephone number for excavators to access appropriate One Call services. As referenced in the DOT's petition, Outside Force damage to buried utilities is the leading cause of pipeline incidents occurring between 1986 and 2001. Although this type of damage can occur for a number of reasons, the failure of proper notification from an excavator prior to digging is universally recognized as a common factor.

Anything that can be done to factitate the One Call process will serve to reduce the number of Outside Force damages to pipelines. The creation of a three-digit toll-free telephone number would enhance pipeline operator public education efforts in communicating the importance of "calling before you dig". The Indiana Utility Regulatory Commission urges the Federal Communications. Commission to assign a mnemonic dialing code that would lead to the broadest possible use of One Call services. The dialing code 344, which corresponds to the word "DIG" on telephone keypads, is strongly encouraged.

Excavators are comprised of underground facility operators, professional contractors, farmers, and the public. Some do not know the appropriate One Call number to dial, surveys conducted by the Common Ground Alliance have shown that many do not even understand the requirement to call before you dig. Creation of a nationwide three-digit number for One Call purposes will not only lead to reduced damages, it will also lead directly to reduced injuries or deaths, reduced property damage and improved service reliability from our utilities.

Respectfully submitted,

William D. McCarty, Chair

Indiana Utility Regulatory Commission

Annmarie Robertson, Director

Pipeline Safety Division